

COLUMBIA GAS

Transmission



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November 25, 1991

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Dockets Unit, Room 8417
Research and-special Programs Administration
U. S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

RSPA-98-4868-12

RE: DOT/RSPA Docket No. PS-122, Notice 1; Gas Gathering Line Definition;
Notice of Proposed Rulemaking

Dear Sirs:

In response to the referenced Notice published in the Federal Register (56 FR48505) of September 25, 1991, the Columbia Gas Transmission Corporation (Columbia) offers the following comments.

Columbia is a Delaware Corporation. It is a wholly-owned subsidiary of The Columbia Gas System, Inc. It is engaged in the purchase, storage, transmission and sale of natural gas at wholesale for resale in interstate commerce to various affiliated and non-affiliated companies in Delaware, Kentucky, Louisiana, Maryland, Mississippi, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia and the District of Columbia. Its facilities include approximately 12,500 miles of transmission pipeline powered by 132 compressor stations which supply gas at wholesale to 72 retail distribution companies and/or deliver gas for various companies under transportation contracts. Columbia also operates approximately 6,400 miles of gathering lines and 31 associated compressor stations in the Appalachian producing area including Kentucky, Maryland, New York, Ohio, Pennsylvania, Virginia and West Virginia.

Columbia shares the position of the Interstate Natural Gas Association of America (INGAA) and numerous other pipeline companies concerning the need or justification for this proposed rulemaking. We see nothing in the Supplementary Information which demonstrates any pipeline safety need for this rulemaking. On the other hand, it appears that the proposed definition could have significant cost impact on operators of gas gathering lines. All of the material in the sections titled "Problem" and "Background" seems to concentrate on one issue, the inability or unwillingness of pipeline safety enforcement personnel to understand or accept the current definition for "Gathering Line" in 5192.3 of the regulations. Columbia takes exception to the statement in the "Problem" section that "Operators . . . have had difficulty distinguishing a gathering line from a transmission line or distribution line". We believe any operator of a pipeline system can define very clearly which pipelines in the system are gathering lines and which are transmission or distribution lines. Since the existing regulations, §§192.1 and 192.9, clearly require that gathering lines in populated areas must comply with all requirements of the regulations applicable to transmission lines, any stated rationale for this proposed rulemaking is further minimized. The only gathering lines which are of concern in this proposed rulemaking are those in rural areas where pipeline and public

safety concerns have the least impact. Any question as to whether a gathering line in a rural area ends at point A or point B makes little or no difference with respect to pipeline safety concerns.

Columbia submits that RSPA has repeatedly failed to make any showing of a pipeline safety problem associated with gathering lines. This in spite of the fact that RSPA has been trying since 1974 to develop a clearer definition than the one currently in the regulations. Neither has there been any demonstration of any improvement in pipeline safety resulting from this proposed rulemaking. For these reasons, Columbia strongly recommends that RSPA terminate this rulemaking unless and until a definitive and positive showing of pipeline safety need or benefit can be demonstrated.

As stated in the section of the Supplementary Information titled "Alternative Definitions Discussed with Advisory Committee", representatives of RSPA met with representatives of the American Petroleum Institute (API) and INGAA on several occasions in 1988 and 1989. As a result of these meetings, API and INGAA developed and presented to RSPA a clear and functional definition of gathering line. This definition included four distinct options for determining the downstream end of a gathering line which were generally acceptable to most pipeline operators and which could have been implemented with minimum cost impact.

For reasons not explained in this Notice, RSPA has modified the proposed API-INGAA definition in a way that makes it generally unacceptable, inflexible and significantly increases the potential cost impact. If RSPA chooses to proceed with this rulemaking, Columbia recommends the following definition, as developed by API and INGAA, be substituted for the definition included in this Notice:

Gathering Line means one or more segments of pipeline, usually interconnected to form a network, the primary function of which is to transport gas from one or more production facilities to:

- (a) the inlet of a gas processing plant (excluding straddle plants),
or
- (b) if no gas processing plant is located downstream the most downstream
of:
 - (1) the point of custody transfer of gas to a line which transports gas to a distribution center or a line within such a distribution center, a gas storage facility, or an industrial consumer;
or
 - (2) the point of last commingling of gas from a single field or separate geographically proximate fields;
or
 - (3) the outlet of a compressor station downstream of the point of last commingling described in (b)(2) if compression is required for the gas to be introduced into another pipeline.

Columbia is particularly concerned that item (b)(3) in the above definition be included in any definition which might be issued in a final rule. In the Appalachian production fields, well pressures are frequently very low and gas transported in gathering lines requires compression to enter transmission lines. The compressor station is an essential part of many Appalachian gathering systems and provides a very clear and distinguishable termination point for gathering lines in this area.

In the above definition as well as the definition proposed in this rulemaking notice, one of the options for determining the downstream end of a gathering line is 'the point where custody of the gas is transferred to others who transport it by pipeline to . . .'. Generally speaking, a point of custody transfer is defined by some form of measurement. However, it is noted that the definition for "production facility" references "associated measurement" in item (2) of the definition. Furthermore, it is not uncommon in Appalachian production fields for custody transfer from the producer to the gathering line operator to occur within the field but not necessarily at the wellhead. Columbia believes that RSPA intends that the 'custody transfer' referred to in the proposed gathering line definition occurs at some point downstream from the production field and is not intended to be custody transfer which occurs at the wellhead or within the production field. To clarify this point, Columbia recommends the following alternative wording:

(2) If there is no natural gas processing plant, the point downstream of a production field or two adjacent production fields where custody of the gas is transferred to others who transport it by pipeline to:

- (i)
- (ii)
- (iii)

Columbia recommends that item (4)(iii) be deleted from the proposed definition. The regulatory jurisdiction of the Federal Energy Regulatory Commission (FERC) and RSPA encompass totally different concerns. The jurisdiction of FERC is directed primarily toward such concerns as supply, continuity of service and rates. The RSPA jurisdiction is directed totally toward pipeline safety. It is very possible that some pipelines may be jurisdictional to FERC and yet may functionally be gathering lines. There is no pipeline safety benefit to making such lines transmission lines. Columbia operates some pipelines such as these and we are aware of other operators with the same situation. The functionality of a pipeline should be the primary criteria for determining if a line is a gathering line or a transmission line for purposes of pipeline safety concerns.

In the "Impact Assessment", RSPA states that any pipelines which are reclassified as transmission lines "would only be subject to the operating and maintenance requirements". This statement is not clear in its intent and meaning. Does this mean that pipelines reclassified as transmission lines under the proposed new gathering line definition would be exempt from the requirements of §192.14? Columbia recommends that RSPA describe specifically what procedures would be required for pipelines reclassified as transmission lines as a result of this rulemaking.

Also, in the Impact Assessment, RSPA asks for comments on specific issues. Columbia offers the following response:

1. RSPA seeks comments on how many miles of pipelines currently classified as gathering lines would have to be reclassified as transmission lines.

Until the proposed rule is finalized, Columbia is unable to accurately define the number of miles of pipeline that would be reclassified under this proposed rule. If no changes are made in the proposed definition, Columbia would likely have several hundred miles of pipeline that would be reclassified.

2. Have these pipelines been the subject of dispute between the pipeline operator and state or federal enforcement personnel?

Columbia is not aware of any of its gathering lines which have been the subject of a dispute with state or Federal enforcement personnel.

3. RSPA seeks comments on any costs associated with reclassification.

Columbia has not developed costs related to possible reclassification to pipelines. However, based on experience with existing transmission pipelines, the following approximate costs would be applicable for installation of cathodic protection in areas of active corrosion. These costs are per 1,000 feet for various diameter pipelines:

<u>Pipe D .</u>	<u>No. of Anodes/1,000 ft.</u>	<u>cost</u>
4.5 inch	59	\$ 7,080
6.625 inch	87	\$10,440
8.625 inch	113	\$13,560
10.75 inch	140	\$16,800
12.75 inch	167	\$20,040
20.00 inch	262	\$31,440

If testing is required for reclassified lines, significant additional costs will be incurred even if natural gas can be used as the test medium. In addition to these initial costs, there would also be ongoing increased operating and maintenance costs for patrolling, leakage inspection, cathodic protection and other O&M requirements.

Also associated with reclassification and with operating and maintenance requirements is the requirement to establish an MAOP for reclassified lines in accordance with §192.619. Unless a provision similar to 192.619(a)(3) or a "grandfather" clause similar to 192.619(c) is included in the final rulemaking order, reclassified pipelines will be subject to establishing an MAOP based on 192.619(a), the design pressure of the weakest element in the segment or a related test. Columbia strongly recommends that RSPA give serious consideration

to this usage and include in the final rule a procedure for establishing the MAOP for reclassified lines based on the current or previous highest operating pressure over an appropriate time period.

If RSPA does not choose to accept the above mentioned industry developed definition, Columbia recommends the following changes to the RSPA proposed definition as a minimum

1. Make items (2) and (3) in the proposed definition interchangeable or reverse the order of (2) and (3).
2. Add a fourth alternate interchangeable with items (2) and (3) in the proposed definition as follows:
 - (4) the outlet of a compressor station downstream of the point of last commingling described in (3) if compression is required for the gas to be introduced into another pipeline.
3. Delete item(4)(iii).
4. Provide a procedure to determine MAOP based on the highest operating pressure during an appropriate time period

Columbia appreciates the opportunity to provide comments on this proposed rulemaking. We strongly encourage RSPA to consider these comments as well as those provided by INGAA and other pipeline operators.

Sincerely,



R. N. Pierce
Director
Engineering Services